

THE HONORABLE BARBARA ROTHSTEIN

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

WILDWOOD TOWNHOME OWNERS  
ASSOCIATION, a Washington Non-Profit  
Corporation,

Plaintiff,

v.

AMERICAN FAMILY MUTUAL  
INSURANCE COMPANY, S.I., a Wisconsin  
Company; and DOE INSURANCE  
COMPANIES 1-10,

Defendants.

No.: 2:21-cv-01080-BJR

STIPULATED MOTION FOR  
CONTINUING PRETRIAL LITIGATION  
DEADLINES

Plaintiff Wildwood Townhomes Owners Association (the “Association”) and  
Defendant American Family Mutual Insurance Company, S.I. (“AmFam”) stipulate to this  
motion for a continuance of the pre-trial deadlines and respectfully request a short extension  
of pre-trial deadlines.

Pursuant to LCR 16(b)(6), a scheduling order may be modified “only for good cause  
and with the judge’s consent.” Good cause exists here as Plaintiff learned its bad faith expert  
was retiring and must find a new expert prior to the disclosure deadline. Plaintiff has worked  
to find a new expert, however that individual cannot review the file and produce a report

before the disclosure deadline currently set for September 22, 2022. Accordingly, Plaintiff requested a continuance of pretrial deadlines to permit Plaintiff time to find a new expert and have a report produced. This extension is not made for purposes of delay. Defendant AmFam has agreed to the requested continuance of certain pretrial deadlines on condition that the new deadlines will not impact the currently-set trial date. The parties respectfully request that the Court extend the currently scheduled deadline as set forth below. A proposed order is included herewith.

Event	Current Deadline	New Deadline
Disclosure of expert testimony under FRCP 26(a)(2) due	9/22/2022	11/7/2022
Discovery completed by	10/22/2022	12/6/2022
All dispositive motions must be filed by this date and noted for consideration no later than the fourth Friday thereafter (see LCR 7(d))	11/21/2022	1/6/2023

The Parties believe that there is good cause under Federal Rule of Civil Procedure 6(b) and Local Civil Rule 10(g) for a continuance of certain pretrial deadlines due to the reasons set forth above.

DATED: September 9, 2022

Lane Powell PC

By: /s/Stephania Denton  
 Stephania Denton, WSBA #21920  
 dentons@lanepowell.com  
 Karla White, WSBA #59171  
 martinezwhitek@lanepowell.com  
  
 Attorneys for American Family Mutual  
 Insurance Company, S.I.

Stein, Sudweeks & Stein, PLLC

By: /s/Cortney Feniello  
 Jerry H. Stein, WSBA #27721  
 jstein@condodeflects.com  
 Justin D. Sudweeks, WSBA #28755  
 justin@condodeflects.com  
 Daniel J. Stein, WSBA #48739  
 dstein@condodeflects.com  
 Cortney M. Feniello, WSBA #57352  
 cfeniello@condodeflects.com

Attorneys for Plaintiff Wildwood  
 Townhomes Owners Association

**ORDER**

Based on the above Stipulated Motion, IT IS SO ORDERED that the pretrial deadlines be extended as follows:

Event	Current Deadline	New Deadline
Disclosure of expert testimony under FRCP 26(a)(2) due	9/22/2022	11/7/2022
Discovery completed by	10/22/2022	12/6/2022
All dispositive motions must be filed by this date and noted for consideration no later than the fourth Friday thereafter (see LCR 7(d))	11/21/2022	1/6/2023

The Court also hereby continues the deadline for the parties' pretrial statement to March 22, 2023, the date of the pretrial conference to April 11, 2023, and the start of the trial to April 24, 2023.

IT IS SO ORDERED this 13th day of September, 2022.



THE HONORABLE BARBARA J. ROTHSTEIN